

ORIGINAL

Before the  
Federal Communications Commission  
Washington, DC 20554

JUN 11 1996

In the Matter of )

Implementation of the )  
Telecommunications Act of 1996: )

CC Docket No. 96-115

Telecommunications Carriers' Use )  
of Customer Proprietary Network )  
Information and Other )  
Customer Information )

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**COMMENTS OF AIRTOUCH COMMUNICATIONS, INC.**

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## SUMMARY

In these Comments, AirTouch Communications. Inc. generally supports the Commission's proposal regarding Customer Proprietary Network Information ("CPNI").

In particular, AirTouch supports the Commission's tentative decision to treat local, interexchange, and commercial mobile radio services ("CMRS") as three separate and distinct telecommunications services for purposes of implementing new Section 222 of the Communications Act, as amended. That approach properly balances the legitimate privacy concerns of consumers with the efficiency needs of competitive carriers.

Because Section 222 of the Communications Act does not specify (with two limited exceptions) whether the prior customer approval needed to be obtained by carriers must be in writing or can be oral, AirTouch believes that the Commission's decision on that important issue should be governed by what is in the public interest. Logically, the Commission should make that public interest determination on the basis of the competitive environment of the relevant telecommunications service from which the CPNI was obtained. As a result, those carriers that obtain CPNI from traditionally competitive telecommunications markets (i.e., long distance and CMRS), should be given flexibility to decide whether they should obtain written or oral approval from their customers. On the other hand, the Commission should require that at least large local exchange carriers be required to obtain prior written customer approval if they want to use local calling CPNI to market other telecommunications services. In these Comments, AirTouch also proposes specific safeguards that the Commission should implement

regarding the use and dissemination of local calling CPNI, as well as the disclosure of CPNI to third parties.

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**COMMENTS OF AIRTOUCH COMMUNICATIONS, INC.**

AirTouch Communications, Inc. ("AirTouch") herein comments on the important issues raised by the Commission's Notice of Proposed Rulemaking ("Notice") in the above-captioned proceeding.

**I. INTRODUCTION**

Passage of the Telecommunications Act of 1996 has created the potential for unprecedented competition in many telecommunications markets. Section 702 of that Act (now Section 222 of the Communications Act of 1934, as amended) is an important part of Congress' plan to ensure that such competition successfully thrives, especially in those markets that have been traditionally controlled by monopolies.

By establishing Section 222, Congress sought to address two important aspects of the competitive environment created by the Telecommunications Act of 1996. First,

Congress recognized that consumers have a general privacy right to control the use by telecommunications carriers of customer proprietary network information ("CPNI"). Second, Congress recognized the importance of preventing telecommunications carriers from using CPNI unfairly and anticompetitively.

In its Notice, the Commission sets forth a sound proposal -- one that carefully and appropriately balances the important competing interests of promoting efficiency, competition, and consumer privacy. Together with the suggestions contained in these Comments, AirTouch believes that the Commission's establishment of these new CPNI rules will both foster competition and preserve the important privacy rights of consumers.<sup>1</sup>

## II. DEFINITION OF TELECOMMUNICATIONS SERVICES

AirTouch strongly agrees with the Commission's tentative decision to treat local (including short-haul toll), interexchange (including interstate, intrastate, and international long distance, as well as short-haul toll), and commercial mobile radio services ("CMRS") as three separate and distinct telecommunications services.<sup>2</sup> We believe that such an approach of dividing telecommunications services into three broad

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<sup>1</sup> Because of the important nationwide competitive and privacy issues involved with the disclosure of CPNI, the Commission should reaffirm that its CPNI rules preempt any inconsistent state requirements. See Notice at paras. 16-18.

<sup>2</sup> Notice at para. 22. CMRS would, of course, include all types of CMRS including cellular, PCS, paging, CMRS long distance, and related ancillary services.

categories properly balances the legitimate privacy concerns of consumers with the efficiency needs of competitive carriers.

In particular, we believe that adopting a reasonably broad definition of separate telecommunications services is important because consumers generally expect that their telecommunications carriers will be knowledgeable about their customers' telecommunications needs. Such knowledge is often based upon CPNI. In fact, carriers need to use CPNI to appropriately and proactively provide their customers with information regarding new and innovative offerings that relate directly to services carriers are already providing to those customers. Anticipating customer needs and satisfying customer requirements are the hallmark of world class, highly competitive telecommunications carriers,<sup>3</sup> and are important goals that both Congress and the Commission clearly want to promote. The Commission's broad definition of "telecommunications services" will allow carriers to appropriately anticipate and satisfy such customer needs and requirements.

At the same time, the Commission has long recognized -- and Congress has now required by statute -- that consumers have a right to privacy regarding the use of their CPNI for purposes other than the provision of the particular telecommunications service from which the CPNI was derived. We believe that the Commission's proposed definition of telecommunications services correctly takes into account consumers'

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<sup>3</sup> For purposes of Section 222 and the Commission's implementing rules, the term "telecommunications carrier" should be interpreted to include all commonly controlled telecommunications entities. To hold otherwise would unnecessarily and inappropriately elevate form over substance, since it would encourage such entities to merge merely to avoid an onerous application of Section 222 -- even if there were other important reasons to maintain separate corporate structures.

privacy expectations regarding the restricted use of CPNI for promoting other services and accurately reflects Congress' intent.

### III. CUSTOMER NOTIFICATION AND PRIOR APPROVAL

Both the Commission and Congress have correctly recognized that a key component for balancing the privacy interests of consumers and promoting a competitive business environment is to ensure that consumers know that they have the right to restrict access to CPNI obtained from their use of telecommunications services.<sup>4</sup> The Commission has also correctly recognized that, with two limited exceptions,<sup>5</sup> Section 222 does not specify whether the prior customer approval needed to be obtained by carriers before using CPNI must be in writing or can be oral.<sup>6</sup> This lack of statutory specificity means, of course, that the Commission has the authority to determine the type of prior customer approval that is in the public interest and to require that such an approval process be used. Logically, the Commission should make that public interest determination on the basis of the competitive environment of the relevant telecommunications service from which the CPNI was obtained.

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<sup>4</sup> Notice at para. 28.

<sup>5</sup> See Section 222(c)(2) (requiring an "affirmative written request") and Section 222(d)(3) (presumably permitting oral customer approval during an inbound, customer initiated call).

<sup>6</sup> Notice at paras. 30 and 31.



A. Carriers In Traditionally Competitive Telecommunications Markets Should Be Given Flexibility Regarding Customer Approval

In traditionally competitive markets, such as CMRS and long distance, customers have long had a choice among telecommunications carriers. As a result, carriers providing those telecommunications services have generally been very careful not to invade customers' privacy by, for example, misusing their CPNI. This reflects the fact that if a carrier in a competitive market misuses CPNI to the detriment of its customers those customers can easily choose to give their business to other carriers that do a better job of maintaining customer confidentiality. This market-place discipline imposed upon carriers operating in competitive markets is extraordinarily effective since it is difficult and expensive to attract and maintain customers.

Because of the strong existing market incentives to maintain customer loyalty by, among other things, protecting the privacy of CPNI, there is simply no demonstrated need for the government to mandate the type and form of prior customer approval for traditionally competitive markets. Some competitive carriers may, as the Commission suggests, find it worthwhile to obtain written documentation from their customers so that it will be easy to prove that they properly obtained a customer's consent if there were a dispute. Other competitive carriers may not find that approach to be necessary and will rely instead upon properly documented oral approvals. Because Section 222 does not, with the limited exceptions noted above, mandate whether the required CPNI consent must be in writing or can be oral, the Commission should afford carriers in competitive

markets the flexibility to decide the type of approval they will obtain from their customers.<sup>7</sup>

**B. Local Exchange Carriers Should Be Required To Obtain Written Authorization to Use Local Calling CPNI to Market Other Telecommunications Services**

Local exchange carriers ("LECs") should be required always to obtain prior written authorization regarding use of CPNI derived from local exchange services. This is very important both to ensure adequate protection of consumer privacy interests and to guard against the real possibility of anti-competitive mischief.<sup>8</sup> By requiring prior written authorization, those carriers that have obtained sensitive, valuable local calling CPNI merely because their customers had no choice but to use those carriers' services will not be able to leverage that information too easily into unfair competitive advantages that harm competition in other markets.<sup>9</sup>

Because of their traditional monopoly franchise, LECs have unique access to extraordinarily important and competitively valuable CPNI. For example, several types

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<sup>7</sup> If a carrier in a competitive market were to be found to have violated Section 222's prior customer approval requirement, the Commission might reasonably consider imposing a requirement that such an offending carrier be required in the future to always obtain written customer approval.

<sup>8</sup> In light of the recognition by Congress that some restrictions placed on large LECs may not be appropriate for small and mid-sized LECs (see, e.g., Section 251(f) of the Communications Act), as well as the Commission's prior approach of not applying CPNI rules to such LECs, AirTouch believes that the continuation of such distinctions among LECs might be appropriate. As a result, the Commission might reasonably decide not to require written authorizations by all LECs.

<sup>9</sup> When, in the future, wireline local telecommunications services become subject to real competition, then it would be appropriate for the Commission to revisit this issue and eliminate the requirement that LECs always obtain prior written authorization.

of CPNI that are solely within the LECs' possession include local calling patterns (including whether a customer makes a lot of long distance calls, places many calls to CMRS phones, or places many calls to a particular geographic area), and the use of local calling cards. In essence, LECs have very competitively sensitive information regarding virtually everyone within their service area that is relevant to all three categories of telecommunications services. Such long time local calling profiles are valuable in selectively targeting high value potential CMRS or long distance customers.

As a result, if LECs are to be permitted to use such valuable information to compete in other telecommunications markets (even though they possess that information merely because they historically had a monopoly on local calling services), then it is important that other competitors also have access to such unique information. To accomplish this, AirTouch suggests that until a LEC loses its monopoly on local calling (i.e., its market share is less than some reasonable amount, such as 75 percent) it should be required to provide the opportunity for customers to authorize provision of local exchange CPNI to third parties at the same time it seeks to obtain written approval for LEC cross-marketing purposes. This approach will, as a practical matter, not only protect customers' reasonable privacy interests, but will also prevent LECs from unfairly leveraging their monopoly-based customer information into competitive markets. Of course, if customers authorize such disclosure, the LECs must make the information available to competing providers at the same time that it is made available to its own personnel.

To avoid LECs from undermining the requirements of Section 222, the Commission must ensure that the statutory definition of CPNI is broadly interpreted in the local calling context to prevent LECs from doing clever, anti-competitive database searches of their local calling records merely to escape Section 222's prohibitions. For example, the Commission should make clear that local calling information that relates to the "type" of telecommunications service includes information on calling card services and choices made for special pricing plans, while the "amount of use" of a service includes the total bill, how long the customer has been with the LEC, etc. The term "destination" should also be clarified to include both the origination and the termination points for local calls.

Similarly, LECs should be prohibited from using local calling CPNI to target certain customers for the purpose of obtaining prior authorization to use their CPNI to market other telecommunications services. For example, LECs should not be permitted to mail special CPNI authorizations to particular customer segments, such as heavy short-haul toll users, CLASS feature customers, second line customers, or other groups that they can initially identify because of local calling CPNI. Without this type of explicit restriction, LECs will be able to uniquely identify and target certain potential customers solely because they provided traditional monopoly services, not because customers voluntarily sought such business relationships.<sup>10</sup>

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<sup>10</sup> Section 601(d) of the Telecommunications Act of 1996 generally permits BOCs and others to "jointly market and sell commercial mobile services in conjunction with telephone exchange service, exchange access" and other telecommunications services. Reading Section 222 of the Communications Act together with Section 601(d) means that such joint marketing is to be permitted as long as those LECs that want to use local

The nature of the written authorization that LECs must be required to obtain from consumers before using CPNI is very important -- both from a privacy and a competitive perspective. AirTouch agrees with the Commission that "customers must know that they can restrict access to the CPNI obtained from their use of a telecommunications service before they can waive that right."<sup>11</sup> Unfortunately, at least one large LEC has already made clear by its actions that it will try to entice customers into allowing the use of their CPNI to market other telecommunications services.

For example, attached hereto as Attachment A is a copy of a glossy brochure that Pacific Bell began to distribute to its local exchange customers in California shortly after passage of the Telecommunications Act of 1996. In very large print, with multiple, bright colors, that brochure asks customers to sign a "Pacific Bell Awards Acceptance Certificate" and to join the "Pacific Bell Awards" program. That program offers customers free or discounted travel (including free airline tickets), food, computer equipment, paging services -- all of which "have no or very few restrictions." However, to become eligible for this awards program, customers must sign a form (which is part of the brochure) that contains, in very small print, a variety of authorizations including -- buried towards the end -- a statement that "I also authorize Pacific Bell Extras and its related companies<sup>[12]</sup> to share

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calling CPNI to jointly market CMRS first obtain prior permission to use customers' local calling CPNI.

<sup>11</sup> Notice at para. 28.

<sup>12</sup> Such companies include Pacific Bell, Pacific Telesis Group, Pacific Bell Mobile Services, Pacific Bell Communications, etc

that [customer] information, [‘including information about my use of telecommunications services and information included in my bills’] with each other ... .”

It appears that by instituting this program Pacific Bell and its affiliates are attempting to use practices reminiscent of those that were once used by some in the long distance industry to “slam” customers by getting them to authorize things through the use of gifts without customers being aware of the real impact of their actions. Just as the Commission has taken effective action to prohibit such practices by the long distance industry,<sup>13</sup> so too the Commission must make it clear that LECs cannot rely upon such award programs and promotions -- combined with small print authorizations -- as a basis for claiming that they have adequate customer authorization to use local calling CPNI to market other telecommunications services.

#### IV. SAFEGUARDS REGARDING THE USE AND DISSEMINATION OF LEC LOCAL CALLING CPNI

In view of the concerns stated above concerning the anti-competitive impact that the use of local calling CPNI can have on the marketplace, AirTouch believes the Commission should place restrictions upon LECs using local calling CPNI until the relevant local calling markets are themselves competitive. These restrictions will protect the development of competition by ensuring consumers are educated about competitive alternatives.

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<sup>13</sup> See, e.g., Sections 64.1100 et. seq. of the Commission’s Rules.

In establishing the requirements for written local calling CPNI authorizations to be used by LECs, the Commission should use as its model the “anti-slamming” requirements set forth in Section 64.1150 of the Commission’s Rules. Using that approach, the Commission should require LECs to obtain written customer authorizations: (1) that are separate from any promotional or other material sent by the requesting LEC, including any inducements that might be offered;<sup>14</sup> (2) that are signed and dated by the local telephone subscriber;<sup>15</sup> (3) that have print that is of sufficient size and is of a readable type to be clearly legible (e.g., 12 point or greater);<sup>16</sup> (4) have unambiguous language that confirms the subscriber’s billing name and address, and each telephone number that is covered by the CPNI authorization; (5) that explicitly state that the subscriber is aware that, although it knows that it does not have to allow the disclosure of local calling CPNI, that it nevertheless authorizes the release of such information to the LEC and its affiliates.<sup>17</sup> Finally, to ensure that those customers who do not understand English are accommodated, the Commission should also require that if any portion of the local calling CPNI authorization is translated into another language, then all portions of that authorization must be translated into that language.<sup>18</sup>

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<sup>14</sup> Cf. Section 64.1150(b) and Section 64.1150(c) of the Commission’s Rules.

<sup>15</sup> Cf. Section 64.1150(b) of the Commission’s Rules.

<sup>16</sup> Cf. Section 64.1150(e) of the Commission’s Rules.

<sup>17</sup> Cf. Section 64.1150(e) of the Commission’s Rules.

<sup>18</sup> Cf. Section 64.1150(g) of the Commission’s Rules.

Of course, if a customer decides not to submit a signed, written authorization as requested by the LEC, then it must be treated by the LEC as a denial of consent and that consumer should not be re-solicited for a reasonable period of time (such as, for example, six months).

As a technical matter, AirTouch suggests that once written authorization is obtained from a local calling customer, the "unrestricted CPNI" be segregated from all remaining restricted CPNI. It is important that computer systems be designed by the LECs to block out restricted local calling CPNI from all employees responsible for marketing or otherwise selling non-local calling telecommunications services. Employees must be trained and informed about these CPNI prohibitions. To ensure that such protective systems are adequate, each LEC should make public a general description of the computer and other protective systems that are being used, including how they train and inform employees about prohibited practices.

Because compliance with these CPNI rules is so important, those LECs who obtain customer approval to use local calling CPNI to market other telecommunications services should be required to have a corporate officer certify to the Commission on an annual basis that they are in compliance with the Commission's CPNI rules. Such a self-certification system would minimize the regulatory oversight costs for both LECs and the Commission. Of course, if evidence becomes available that shows that a certification is false, the Commission would be authorized to take appropriate enforcement action. AirTouch also suggests that to minimize the burden on the Commission, LECs should file copies of those solicitation and consent forms used to obtain and record local calling



CPNI authorizations in a public file that LECs should establish (just as radio and television stations have long done regarding their FCC documents). Interested parties could then review those materials to ensure compliance with the Commission's rules.

## V. CPNI DISCLOSURE TO THIRD PARTIES

Customers have the right to expect that their CPNI will not be disclosed to others, especially other telecommunication carriers, for marketing purposes unless they give their express approval. The Commission should interpret Section 222(c)(2) as prohibiting carriers from disclosing to third parties customer CPNI without the affirmative written approval of the customer. Such approval should clearly specify whether there are any restrictions on the information that can be disclosed and specify the carrier or carriers to whom the information can be disclosed.

The process to be used by third parties such as other telecommunications carriers to obtain CPNI from another carrier should be the same as used by LECs to obtain authorization to use local calling CPNI. Such requirements (discussed in Section IV above), reasonably balances the privacy needs of consumers, the interests of potential new competitors, and the security needs of the customer's current carrier. In addition, to protect the privacy interests of consumers the Commission should make clear that any authorization to release CPNI to a third party must be limited to that party and cannot be passed on to others without the express written approval of the customer. Similarly, such authorizations should be valid for only a single request for specific CPNI. Such

limitations will avoid the problem of repeated, open-ended use of potentially stale CPNI authorizations when consumers no longer want their CPNI disclosed.

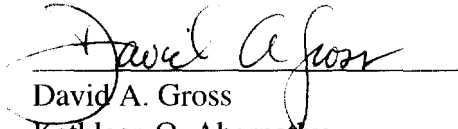
To further protect consumer privacy, CPNI authorizations should not be automatically renewable (i.e., the requesting carrier should be required to get the customer's approval again to ensure that the customer still consents to the disclosure), and the CPNI that is disclosed should not be allowed to be shared with, or sold to, any other party without the express written consent of the customer that specifically names the other party. Compliance with these rules should also be the subject of an annual certification by an officer of the requesting third party. That certification can also be placed in the carrier's public file and be available for inspection.

Those carriers that are presented with an affirmative written request for CPNI disclosure by another carrier should be given sufficient time (e.g., 30 days) to review the request to ensure that the correct party (i.e., the subscriber) signed it and that it is otherwise valid. At the end of the 30 day period, if not before, the carrier holding the requested CPNI should then provide it to the requesting carrier.

## VI. CONCLUSION

For the foregoing reasons, AirTouch respectfully suggests that the Commission adopt its proposal as set forth in the Notice, with the modifications discussed above. Such a result would greatly advance the public interest.


Respectfully submitted,



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








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June 11, 1996



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**Award Partners:**

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## Introducing **PACIFIC BELL** **Awards** SM

As a Pacific Bell customer, you can earn Awards from your entire phone bill—just for doing what you already do!  
**And membership is free.**

### **Now Using the Phone Can Be an Award-Winning Experience!**

Only Pacific Bell Awards lets you earn Award Points for your **entire** phone bill. We include local calls, your long-distance calls billed through Pacific Bell, services like Call Waiting—everything included in your bill.

And it doesn't matter if your long-distance company is already rewarding you for long-distance calls—you don't have to give that up! Because we'll even reward you for your long-distance calls as long as they are billed through Pacific Bell. So, you'll receive the **greatest number of points if you receive a Pacific Bell combined local and long-distance bill**, a convenience that is still available. (If you currently receive a separate bill from your long-distance company, you may want to ask them about the possibility of combining it with your Pacific Bell bill.)

### **Our Customers Talked. We Listened.**

Before we designed this new program, we asked Pacific Bell customers what they'd really value. Here's what they told us: "Give us something we can **claim quickly**, within a couple of months, as well as **big rewards** we'd save longer for." "We'd like **dollars-off** and **free** rewards, in addition to free airline tickets." "And don't put a lot of restrictions on rewards—we want to be able to **use** them when we want to." "Make sure it's **simple to use** and understand, but give us lots of **choice**."

We listened to what our customers told us. The result: **Pacific Bell Awards**—straightforward, easy to understand, **dollars-off** and **free** rewards—including some you could claim after just one month!

## Now making a phone call can be an award-winning experience!

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### BUSINESS REPLY MAIL

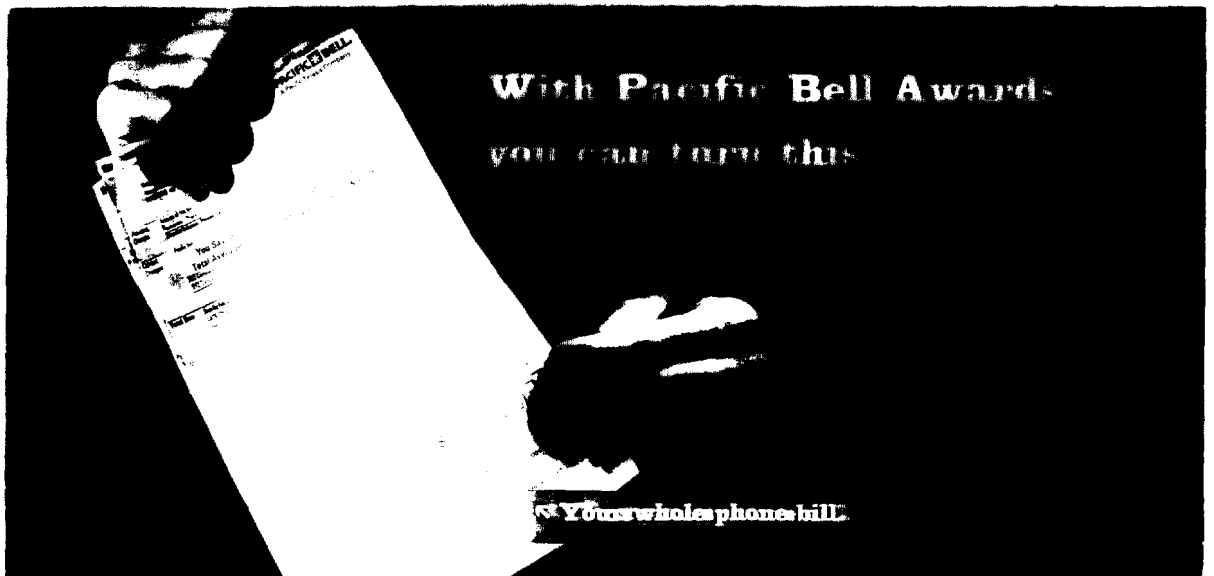
FIRST CLASS MAIL

PERMIT NO. 1000

LOS ANGELES, CA 90002

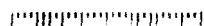
POSTAGE WILL BE PAID BY ADDRESSEE

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**LOS ANGELES CA 90099-9160**



**With Pacific Bell Awards**  
**you can turn this**

**into your whole phone bill.**



A collage of various patterns and textures, including stripes, polka dots, and abstract shapes, arranged in a dynamic, overlapping composition. The collage features a mix of black and white patterns, including stripes, polka dots, and abstract shapes, set against a dark background. The patterns are layered and overlapping, creating a sense of depth and movement. The overall effect is a complex, multi-layered visual composition.



**Right now**, all this makes you think of is  
your phone bill. **But soon**, it will make you  
think of traveling. Dining out. Cool computer  
stuff. And words like **SAVE**,  
"**DOLLARS-OFF**" and **FREE!**

Open here  
to see how to turn your  
whole phone bill into  
awards—for **AT&T**.

**Open here**  
to see how to turn your  
**whole** phone bill into  
awards—for **free**.

And this!

saving.  
 But hotel lobby.  
 Point of serious  
 financial  
 and service.  
 Social and even more for  
 the people.

The next time you talk on the phone, make it an award-winning performance!

The next time you talk on the phone, make it an award-winning performance!

[illegible]

We listened to what our customers told us. The result: **Pacific Bell Awards**—straightforward, easy-to-understand "**dollars-off**" and **free** rewards—including some you could claim after just one month!

## You'll Reap the Awards from Your Whole Bill!

**Here's how Pacific Bell Awards works:** Each month, your **total** Pacific Bell phone bill is **\$50** or more, you'll receive 10 points for each of those dollars—**\$50 = 500 points**. Combine that with your 1,000-point bonus, and it's already enough to claim an award!

### Just a Few Examples of Awards You Could Claim Really Fast

Points	Description
<b>1,000</b>	\$10 off car rentals, software, sports equipment or specialty catalog items
<b>2,500</b>	3 free months paging service; \$25 off domestic airfares, cruises, or computer equipment
<b>5,000</b>	Free dining coupon book; \$50 off domestic or international airfares

Claim the awards above in just a few months. Or save your points for the big stuff, like **free** airline tickets. And you've got plenty of **choice** in between. All Pacific Bell Awards are **easy** to claim, and have no or very few restrictions.

### Pacific Bell Awards Acceptance Certificate

It Doesn't Take Magic to Turn Your Phone Bill into Awards.

## Just Your Signature.

**Sign up before May 15, 1996, and qualify for a 1,000-point bonus—already enough to redeem for an award!**



Of course I want to be rewarded for doing what I already do! Please enroll me in Pacific Bell Awards, send me membership materials and credit my account with 1,000 bonus points.

Please note: you will begin earning points and receive your 1,000-point bonus on your first Pacific Bell phone bill with current charges totaling \$50 or more after we have received your signature.

### Three Convenient Ways to Accept Your Free Membership:

1. **Mail.** Sign below, then detach, fold, send and mail your signature.
2. **Fax.** Or sign below and then fax it to **1-800-403-1106**.
3. **Phone.** Or call **1-800-419-8000**.

(If you choose this option, we will still require your signature before you can redeem Awards.)



**PACIFIC BELL**  
NETWORK

How will you use it?

**X**

By signing this Pacific Bell Awards Acceptance Certificate, I agree to the following terms and conditions:

1. I am a resident of the United States and am at least 18 years old at the time of signing this certificate.

2. I understand that Pacific Bell Awards is a rewards program that allows me to earn points for my phone bills and redeem them for awards.

3. I understand that the awards are subject to availability and may vary in value.

4. I understand that the awards are not cash and cannot be redeemed for cash.

5. I understand that the awards are not redeemable for travel expenses.

6. I understand that the awards are not redeemable for cash or other awards.

7. I understand that the awards are not redeemable for cash or other awards.

8. I understand that the awards are not redeemable for cash or other awards.

9. I understand that the awards are not redeemable for cash or other awards.

10. I understand that the awards are not redeemable for cash or other awards.

MOISTEN, FOLD AND SEAL

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